

Remarks/Arguments

Claims 1 through 21 are pending in this application.

The Office Action asserts that under 35 U.S.C. §102(e), claims 1 through 21 are anticipated by U.S. Patent Publication No. 2004/0153663 to Clark.

Independent claim 1 recites a method for data cleansing, including receiving at least one input address, comparing the at least one input address to at least one standard, and providing a single best address derived from the at least one input address based on the comparison.

Clark discloses a method for assessing the risk of identity theft. The method uses statistical modeling of negative and demographic data elements associated with a street address to identify suspected fraud based on the address information. The method includes analyzing socioeconomic and other demographic data associated with a specific street address when presented as an address change on an existing account or an address included on a new account application when that address is different from a reference address. The reference address may be provided by an applicant or obtained from a credit bureau. After analysis of the demographic data based on the two addresses, the data is compared for divergence and scaled to reflect a relative fraud risk.

Clark fails to anticipate claim 1. **Clark does not disclose or suggest producing a single best address.** The method disclosed in Clark compares demographic data based on two addresses and produces an indication of relative fraud risk. The Office Action asserts that Clark performs updating an address file based on a comparison of the addresses. As support for this assertion, the Office Action cites block 84 of FIG. 2 in Clark and concludes that the step of "updating the address information" constitutes "providing a best address information." However, block 84 of FIG. 2 discloses the step of updating an address velocity file, not the

address itself. Clark, including FIG. 2, does not disclose providing a single best address. The address velocity file disclosed in Clark stores information relating to inquiry activity concerning both the new address and the reference addresses. When the address velocity file is updated, information relating to the frequency of inquiries is appended to the addresses. See paragraph [0222]. In other words, rather than cleansing the data by providing a **single** best address, the method of Clark retains **multiple** addresses and appends additional information to those addresses. Even allowing for the broadest reasonable interpretation of claim 1, Clark does not disclose or suggest producing a single best address. Consequently, claim 1 is patentable over Clark.

Claims 2 through 11 depend from independent claim 1 and are patentable over Clark for at least the reasons given above regarding claim 1.

Independent claims 12 and 20 include elements similar to those found in claim 1. Claims 12 and 20 are therefore patentable over Clark for at least the reasons given above regarding claim 1. Claims 13 through 19 depend from independent claim 12 and claim 21 depends from claim 20. Claims 13 through 19 and 21 are also patentable over Clark by virtue of their dependency on claims 12 or 20.

In view of the above, Applicants respectfully submit that all claims presented in this application are patentably distinguishable over the cited reference. Accordingly, Applicants respectfully request favorable consideration and that this application be passed to allowance.

Respectfully submitted,

Date: August 21, 2006



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